

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

DONALD C. GOINS, ESQ. (DCG1005)  
GOINS & GOINS, LLC  
323 Washington Avenue  
Elizabeth, NJ 07202  
Phone: (908) 351-1984  
Fax: (908) 351-1982  
Attorney for the Debtor

In Re:

Danetia D. Welch,

Case No.: 20-12251

Judge: MBK

Chapter: 13

### CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following (**choose one**):

1. ☐ Motion for Relief from the Automatic Stay filed by \_\_\_\_\_, creditor,

A hearing has been scheduled for \_\_\_\_\_, at \_\_\_\_\_.

☒ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for July 14, 2021, at 9:00 am.

☐ Certification of Default filed by \_\_\_\_\_,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (**choose one**):

☐ Payments have been made in the amount of \$ \_\_\_\_\_, but have not been accounted for. Documentation in support is attached.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

☒ Other (**explain your answer**):

I filed a modified plan on July 8, 2021 and the confirmation hearing is scheduled for August 11, 2021. No objections to the Modified Plan have been filed as of today. I am asking to adjourn this matter to August 11, 2021 to be heard on the same date as my confirmation hearing.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 7 / 12 / 2021

/s/ Danetia D. Welch  
Debtor's Signature

Date: \_\_\_\_\_

\_\_\_\_\_  
Debtor's Signature

**NOTES:**

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.